June 18, 2021

VIA ECF

Honorable Edward S. Kiel, U.S.M.J. United States District Court, District of New Jersey United States Post Office & Courthouse Federal Square, Courtroom 8 Newark, New Jersey 07101

Re: Parties' Joint Request for an Extension of Time
to Submit Proposed Discovery Confidentiality Order
United States ex rel. Silbersher v. Janssen Biotech, Inc.,
No. 19-cv-12107-KM-ESK
Louisiana Health Service & Indemnity Co. v. Janssen Biotech, Inc.,
No. 19-cv-14146-KM-ESK
KPH Healthcare Services, Inc. v. Janssen Biotech, Inc.,
No. 20-cv-05901-KM-ESK

Dear Judge Kiel:

The parties to the above-referenced actions write to jointly request a short extension of time to submit a proposed joint stipulated confidentiality order for Court approval, currently due on Monday, June 21, 2021 (ECF No. 144).

The parties have been actively meeting, conferring and exchanging drafts. The intervening new federal holiday has complicated communications among the various stakeholders, but all parties believe the areas of dispute can be significantly narrowed given a few additional days for discussion.

We respectfully request that the June 21, 2021 deadline be extended until Thursday, June 24, 2021.

With respect to the KPH action, Defendants and KPH respectfully seek an extension of the June 21, 2021 deadline under Local Civil Rule 5.3(c) to file a joint motion to seal confidential materials arising from the Defendants' pending motion to compel arbitration and motion to dismiss. Because the joint motion to seal is tied to entry of a joint stipulated confidentiality order, Defendants and KPH respectfully request that the June 21, 2021 deadline to file a joint motion to seal also be extended until Thursday, June 24, 2021.

Respectfully yours,

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